

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Case No. 13-53846

CITY OF DETROIT, MICHIGAN

In Proceedings Under
Chapter 9

Debtor.

Hon. Steven W. Rhodes

**AMENDED DISCLOSURE OF HEARING WITNESSES AND EXHIBITS
OF AMBAC ASSURANCE CORPORATION**

Ambac Assurance Corporation (“Ambac”), a creditor and/or party in interest in the above-captioned case, in accordance with this Court’s August 29, 2013 Order [Dkt. No. 684] Regarding Debtor’s Motion to Assume Lease or Executory Contract [Dkt. No. 17, corrected by Dkt. No. 157] (the “Motion”), hereby amends its September 5, 2013 Disclosure of Rebuttal Witness [Dkt. No. 725].

Witnesses:

Ambac does not intend to offer any rebuttal witnesses at the hearing.

Ambac does intend to solicit testimony from the three witnesses offered by the Debtor, namely, Mr. Kenneth Buckfire, Mr. Kevyn Orr, and Mr. Guarav Maholtra.

Exhibits:

Ambac may introduce some or all of the following documents as part of its examination of the witnesses, either as rebuttal evidence or as evidence in its case in chief. The Debtor is already in possession of each of these documents.

- Project Piston Cash Flow Forecast (including Restructuring Scenario)
(6/21/13) [Data Room 4.2.1]
- Project Piston Cash Flow Forecast – monthly (FY 2013, FY 2014, FY 2015)
(6/21/13) [Data Room 4.2.2]
- Forbearance and Optional Termination Agreement term sheet
- Documents produced by the Debtor on September 13, 2013, bates numbers DTFOTA0000001 through DFOTA 0000153
- Exhibits attached to Ambac's Objection [Dkt. No. 348]
- Exhibits listed in the Debtor's List of Exhibits and Witnesses [Dkt. No. 345]
- Exhibits listed by any other objecting party
- The deposition transcripts of Mr. Kenneth Buckfire, Mr. Kevyn Orr, and Mr. Guarav Maholtra in the event such witnesses are not available or offered by the Debtor to testify at the hearing.

By reserving its rights to use or rely on any exhibits offered by the Debtor or by other Objectors, Ambac does not waive any objections to admissibility on relevance or other grounds.

Respectfully Submitted,

ARENT FOX LLP

Dated: September 18, 2013

By: /s/ Carol Connor Cohen
CAROL CONNOR COHEN
CAROLINE TURNER ENGLISH
1717 K Street, NW
Washington, DC 20036-5342
(202) 857-6054
Carol.Cohen@arentfox.com

DAVID L. DUBROW
MARK A. ANGELOV
1675 BROADWAY
NEW YORK, NY 10019
(212) 484-3900

and

SCHAFER AND WEINER, PLLC

DANIEL J. WEINER (P32010)
BRENDAN G. BEST (P66370)
40950 Woodward Ave., Ste. 100
Bloomfield Hills, MI 48304
(248) 540-3340
bbest@schaferandweiner.com

Counsel for Ambac Assurance Corporation